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September 17, 2021

VIA ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

**Re: In re Terrorist Attacks of September 11, 2001,
03 MDL 1570 (S.D.N.Y) (GBD) (SN)**

Dear Judge Netburn:

Defendants,¹ together with the Plaintiffs' Executive Committees (collectively, "Parties") write in follow up to the Parties' joint submission dated September 3, 2021, at ECF No. 7096, in which the parties addressed the Court's Order dated August 13, 2021 (ECF No. 7014), but indicated that we would "confer further about the manner in which the expert challenges may be consolidated and about page limit extensions and will set forth a proposal to the Court by Friday, September 17, 2021." Having done so, the parties jointly propose the following.

The Parties have reached a compromise agreement on the number of briefs and the number of pages proposed for expert challenges, with the Plaintiffs proposing fewer briefs and fewer pages than the compromise number and the Defendants proposing more of each. However, in a compromise, the parties have agreed to propose to the Court that, for expert challenges to the six Plaintiffs' experts and seventeen Defendants' experts, each side may file no more than 8 initial briefs totaling no more than 245 pages. The Parties have also agreed to propose to the Court that the Parties defer discussion of the number of briefs and pages for opposition and reply briefs until after the initial briefing is completed, and that the parties should meet and confer within seven days after the initial briefing is completed and propose to the Court page limits on that briefing.

Respectfully submitted,

/s/ Aisha E. R. Bembry

Aisha E. R. Bembry (admitted pro hac vice)

¹ For the purposes of this submission, "Defendants" means Dubai Islamic Bank, World Assembly of Muslim Youth and World Assembly of Muslim Youth International, International Islamic Relief Organization, Muslim World League, the four "Charity Officer Defendants" (Abdullah Omar Naseef, Abdullah bin Saleh al Obaid, Abdullah Mohsen al Turki, and Adnan Basha), and Yassin Kadi.